

NAME	DEPARTURE DATE	REASON FOR DEPARTURE	LAST KNOWN ADDRESS
Avonts, René	March 2002	No reason given	Duivcnstraat 74, 3052 Blanden, Belgium
Dankelman, Françoise	April 2001	No reason given	Drève des Mesanges 20, 1470 Baisy-Thy, Belgium
Dauwe, Geert	March 2002	No reason given	Hadewijchlaan 32, 8500 Kortrijk, Belgium
De Coninck, Dennis	October 1999	No reason given	Schelpenlaan 22, 8453, Bredene, Belgium
De Schaepdrijver, Thomas	January 2001	No reason given	Steenweg op Ninove 32, 9320 Erembodegem, Belgium
Faict, Patrick	April 2000	No reason given	Koninginlaan 63, 8370 Blankenberge, Belgium
Giovagnoli, Christine	October 2002	No reason given	Avenue Trigodet 3, 1401 Nivelles, Belgium
Legein, Manu	April 2000	No reason given	Voorhavenlaan 65, 8400 Oostende, Belgium
Van der Ven, Jan	March 1999	No reason given	Diepestraat 6, 2540 Hove, Belgium
Vermeulen, Christine	July 2000	Personal reasons	Gaverlandstraat 55, 9031 Baarle, Belgium

Interrogatory No. 4

For each of the persons listed in Interrogatory No. 1 whom your response states is not currently, and was not at any time during the Relevant Time Period, a director, officer, or managing agent of Dexia, for each title held during the Relevant Time Period (a) describe in detail the person's job responsibilities, including the nature of corporate matters over which the person exercised discretion or judgment, (b) identify by name and title all persons reporting to the person, (c) identify by name and title all individuals to whom the individual reported, and (d) state whether the person has been requested to make himself or herself available for deposition in this action, and the person's response to any such request.

Response to Request No. 4

Dexia objects to this Interrogatory to the extent it seeks information about persons who cannot be identified or who no longer work for Dexia. Dexia objects to this Interrogatory to the extent it seeks information about the exercise of "discretion or judgment" that is irrelevant to any of the claims or defenses in this action. Dexia objects to this Interrogatory to the extent it seeks information protected by the attorney client privileged, including communications between counsel for Dexia and Dexia employees concerning this litigation. Dexia objects to the

"Relevant Time Period" as applied to this Interrogatory as overly broad and unduly burdensome. Subject to and without waiving the foregoing objections or the General Objections, and pursuant to the compromise that is memorialized in the September 8, 2005, letter from Jeff Butler to Patrick Egan, Dexia responds to this Interrogatory as follows:

(a) René Avonts: From 1998 until his departure in March 2002, Mr. Avonts was a senior executive within the bank whose job responsibilities included managing one or more bank departments, developing client relationships and making decisions concerning a variety of business issues affecting the Bank. While at Paribas, he reported to Philippe Romagnoli or a combination of Philippe Romagnoli and Dirk Bruneel. Numerous employees reported to him including G. Van De Walle, F. Declippel, F. Caes. While at Artesia, he reported to Dirk Bruneel. Numerous employees reported to him including Alain Engel, Dirk Vanderschrick and Stefaan Decraene.

(b) Antoon Baert: In 1998 and 1999, Mr. Baert was a manager in the Kortrijk region whose job responsibilities included preparing credit proposals for presentation to the credit committee at the local level and supervising other members of the credit department. He reported to Willy Mollaert. Andrea Moeremans, Jan Jacques, Urbain Van Damme, Mia Vandekastele, Hilde Maertens, Gino Schepens, Linda Claerhout and Carlos Renier reported to him. Currently, Mr. Baert is a credit manager in the department "Intensief Beheer en Compliance" and his job responsibilities include intensive care in the pre-litigation phase of problematic credit files. He reports to Patrick Van Tiggel and no one reports to him.

(c) Kristin Claessens: In 1998 and 1999, Ms. Claessens was a manager whose job responsibilities included managing the back office of the bank. When she worked in the Professionele & Interbancaire Transacties department, she reported to Eugène Lemineur, and

Rudy Moelants, Kathleen De Braeckeleer, Johan Geeroms, Paul Tack and Guy Van Der Eecken reported to her. When she worked in the Operations Market Transactions department, she reported to Philippe Sterno, and approximately five persons reported to her. Currently, Ms. Claessens is the head of the group Operations Financial Markets within the department Back Office & Organizations Financial Markets and is responsible for managing the Back Office Financial Markets with regard to transactions and products (FXMM, derivative and capital market transactions) and all back-office related activities (confirmations, settlement, accounting). Frank Callens, Luc Van den Broeck and Bernard Dewilde report to her and she reports to Peter Lenaerts.

(d) Jean-Paul Cloes: In 1998 and 1999, Mr. Cloes was an internal auditor whose job responsibilities included conducting audits and drafting audit reports. When he worked in the Interne Audit Participaties en Marktenzaal department, he reported to Eric De Geys. When he worked in the Interne Audit Corporate Banking department he reported to Benny Van Audenhoven. When he worked in the Audit Participaties Gestion Intensif Privé and Corporate Banking department, he reported to Françoise Dankelman. No one reported to him. Currently, Mr. Cloes is an internal auditor whose job responsibilities include conducting audits and drafting audit reports. He reports to Vera Van Rompaey and no one reports to him.

(e) Marleen Coolen: In 1998 and 1999, Ms. Coolen was an in-house attorney whose job responsibilities included providing legal advice on a variety of issues, and particularly on leasing and project finance. She reported to Eric Messely while in the International Corporate Department, and reported to Bernard Mommens while in the Juridische Zaken: Corporate department. Denoal Goffaux, J. L. Devogele, Jean-Blaise Du Bois, and Manu Legein reported to

09/30/2005 17:06 FAX

her. Currently, she has the same job responsibilities but has taken a leave of absence for an undetermined period of time. She reports to Karel Van Riet and no one reports to her.

(f) Dirk Cools: In 1998 and 1999, Mr. Cools' job responsibilities included providing assistance to the corporate banker in charge of managing client relationships. He reported to Paul Van Der Linden when he was based in Kortrijk and to Pol Versaen when he was based in Oostende. No one reported to him. Currently, Mr. Cools is a Loan Officer in the Corporate Banking department whose job responsibilities include the commercial analysis of credit proposals and commercial follow up of granted credits. He reports to Paul Vanderlinden and no one reports to him.

(g) Piet Cordonnier: In 1998 and 1999, Mr. Cordonnier's job responsibilities included explaining the structure of credit transactions to the credit committee. He reported to Marc Van Keirsbilck while in the Corporate Banking Projecten en Financiële Montages department, and reported to Patrick Van Tiggel while in the Niche Banking department. No one reported to him. Currently, Mr. Cordonnier is an in-house attorney within the Legal Corporate department whose job responsibilities include providing legal advice on credit files and the drafting of credit documentation. He reports to Karel Van Riet and no one reports to him.

(h) Françoise Dankelman: From 1998 until her departure in April 2001, Ms. Dankelman was an internal auditor whose job responsibilities included conducting audits and drafting audit reports. While at Bacob, she reported to Noël Reyniers and no one reported to her. While at Artesia Services, she reported to Eric De Geys. Jean-Paul Cloes, Rik Van Damme and Vincent Scoriels reported to her.

(i) Geert Dauwe: From 1998 until his departure in March 2002, Mr. Dauwe was a senior executive within the bank whose job responsibilities included managing one or more bank

09/30/2005 17:06 FAX

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023/033

departments, developing client relationships and making decisions concerning a variety of business issues affecting the Bank. While at Paribas, he reported to Philippe Romagnoli or a combination of Philippe Romagnoli and Dirk Bruneel. Numerous employees reported to him including François Saverys and Gabby Declerk. While at Artesia Banking Corporation, he reported to Dirk Bruneel and numerous employees reported to him including Vincent Sneyers and Paul d'Otreppe.

(j) **Filip De Clerck:** In 1998, Mr. De Clerck was an intern in multiple departments of the bank. In 1999, his job responsibilities included assisting corporate bankers with managing client relationships. He reported to Bart Ferrand and no one reported to him. Currently, Mr. De Clerck is a Senior Operational Relationship Officer whose job responsibilities include the functional guidance and training of other administrative employees and the improving of the efficiency of the Bank through, among other things, the computerization of functions. He reports to Paul Vanderlinden and no one reports to him.

(k) **Dennis De Coninck:** In 1998, Mr. De Coninck worked in the Secretariat Specialised Activities of Paribas where his job responsibilities included the negotiation of loan contracts. From June 1999 until his departure in October 1999, he was an in-house attorney in the department Legal Financial Markets of Artesia Services where his job responsibilities included providing legal advice on financial instruments, asset management, market regulations and investment companies. While at Paribas, he reported to Jan Van der Ven and no one reported to him. While at Artesia Services, he reported to Peter Van Herwegen and no one reported to him.

(l) **Freddy De Gendt:** In 1998 and 1999, Mr. De Gendt's job responsibilities included managing the securities database of the Bank as well as giving technical information

09/30/2005 17:06 FAX

with regard to those securities. He reported to Armand Goossens and I. De Wilder, and Roger Van Rensbergen reported directly to him. Currently, Mr. De Gendt is a Business Analyst who collaborates in the technical analysis of projects with regard to securities files. He reports to Anja Van den Eede and no one reports to him.

(m) Thomas De Schaepdrijver: From 1998 until October 1999, Mr. De Schaepdrijver was seconded as a member of Paribas to Bural NV as an in-house attorney whose job responsibilities included giving legal advice on a variety of issues, particularly litigation and loan recovery issues. He reported to Jean Puelinckx and no one reported to him. From October 1999 until his departure in January 2001, he was a member of the commercial department of Artesia Factors NV. He reported to Jean-Luc Driancourt and no one reported to him.

(n) Jean-Luc Devogele: In 1998 and 1999, Mr. Devogele was an in-house attorney whose job responsibilities included providing legal advice on a variety of issues. He reported to Bernard Mommens while in the Juridische Zaken department, and reported to Marleen Coolen while in the Juridische Zaken Corporate & Contentieux department. No one reported to him. Currently, Mr. Devogele is an in-house attorney in the Participations, Public sector, Real Estate department whose job responsibilities include providing legal advice on a variety of issues, especially corporate law and general commercial law. He reports to Mark Querton and Robert Peemans and no one reports to him.

(o) Jean-Blaise Dubois: Mr. Dubois was an intern in 1998. In early 1999, he was an in-house attorney whose job responsibilities included providing legal advice on a variety of issues, and in June 1999, his main responsibilities included legal advice on recovery and litigation issues. He reported to Karel Van Riet in the Juridische Zaken Corporate & Contentieux department. No one reported to him. Currently, Mr. Dubois is an in-house attorney

09/30/2005 17:06 FAX

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025/033

within the department Legal Corporate whose job responsibilities include providing legal advice on recovery and litigation issues. He reports to Karel Van Riet and no one reports to him.

(p) Patrick Faict: From 1998 until his departure in April 2000, Mr. Faict was a corporate banker whose his job responsibilities included the commercial analysis of credit files and drafting of credit proposals. He reported to L. Stoop and no one reported to him.

(q) Bart Ferrand: In 1998 and 1999, Mr. Ferrand was a corporate banker in Roeselaere and relationship manager for the language and speech technology desk in Kortrijk. His job responsibilities included drafting proposals for the credit committee. He reported successively to Johan Valcke and Philippe Steverlynck. Filip Declerck reported to him when he worked in Roeselaere, and no one reported to him when he worked in Kortrijk. Currently, Mr. Ferrand works in the Structured Finance department and his job responsibilities include the elaboration of financing proposals in specialized activities (acquisition finance, syndicated loans, project finance) to public, corporate and non-profit clients as well as the attraction of new credit files and the management of existing credit files. He reports to Gery Milants and no one reports to him.

(r) Christine Giovagnoli: From 1998 until her departure in October 2002, Ms. Giovagnoli worked as an in-house attorney whose job responsibilities included providing legal advice on a variety of issues, especially litigation and loan recovery issues. She reported to Bernard Mommens while in the Juridische Zaken department and to Claire Debeys while in the Corporate Contentieux department. No one reported to her.

(s) Denoal Goffaux: In 1998 and 1999, Mr. Goffaux was an in-house attorney whose job responsibilities included providing legal advice on a variety of issues. He reported to Bernard Mommens while in the Juridische Zaken department, and reported to Marleen Coolen

while in the Juridische Zaken Corporate & Contentieux department. No one reported to him. Currently, Mr. Goffaux is an in-house attorney working in the department Securities and Financial Markets whose job responsibilities include providing legal advice on financial instruments, asset management, market regulations and investment companies. He reports to Christel Jennes and no one reports to him.

(t) Bernard Lamiroy: In 1999, Mr. Lamiroy was an in-house attorney whose job responsibilities included giving legal advice on a variety of litigation and recovery issues in credit files. He reported to Bernard Mommens and no one reported to him. Currently, Mr. Lamiroy is an in-house attorney in the department Legal Corporate whose job responsibilities include providing legal advice on a variety of litigation and recovery issues in credit files. He reports to Karel Van Riet and no one reports to him.

(u) Manu Legein: From 1998 until his departure in April 2000, Mr. Legein worked as an in-house attorney whose job responsibilities included providing legal advice on a variety of issues, especially litigation and loan recovery issues. While at Bacob, he reported to Peter Van Loock and no one reported to him. While at Artesia Services, he reported to Marleen Coolen and no one reported to him.

(v) Gery Milants: In 1998 and 1999, Mr. Milants' job responsibilities included the project managing of private placements and public listings of companies arranged by the Bank. When he worked in the Origination department, he reported to Christian de Marnix, and no one reported to him. When he worked in the Investment Banking and Corporate Finance departments, he reported to Stefaan Decraene, and no one reported to him. Currently, Mr. Milants is responsible for the development new structured finance offerings, including syndicate loans and club deals, acquisition finance, project finance, shipping and port finance and export

09/30/2005 17:07 FAX

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027/033

finance. He reports to Peter Vermeiren. Thierry Blanpain, Lieve Cornille, Jo De Haeck, Emmanuel Falisse, Bart Ferrand and Peter Rabaey report to him.

(w) Luc Myny: In 1998 and 1999, Mr. Myny worked in the back office and his job responsibilities included the managing of commission payments to brokers negotiating private credits granted by the Bank. He reported to Henk Van der Marliere, and no one reported to him. Currently, Mr. Myny is an operator at the Agent Information Desk, where his job responsibilities normally include the telephonic assistance to agents with questions on payment traffic, but he is on sick leave until at least mid-November. He reports to Bert Willemse and no one reports to him.

(x) Peter Rabaey: In 1998 and 1999, Mr. Rabaey's job responsibilities included drafting proposals for the credit committee. He reported to Jan Van der Ven, and after March 1999 reported to Patrick Van Tiggel. No one reported to him. Currently, Mr. Rabaey is a senior corporate banker within the department Structured Finance where his job responsibilities include the elaboration of financing proposals in specialized activities (acquisition finance, syndicated loans, project finance) to public, corporate and non-profit clients as well as business generation and the management of existing credit files. He reports to Gery Milants and no one reports to him.

(y) Suzanne Tritz: In 1998 and 1999, Ms. Tritz was an in-house attorney whose job responsibilities included providing legal advice on a variety of issues. She reported to Bernard Mommens, and after June 1999, reported to Karel Van Riet. No one reported to her. Currently, Ms. Tritz is an in-house attorney within the Legal Corporate department whose job responsibilities include providing legal advice on a variety of issues. She reports to Karel Van Riet and no one reports to her.

09/30/2005 17:07 FAX

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028/033

(z) Etien Van Coillie: In 1998 and 1999, Mr. Van Coillie worked in the back office. His job responsibilities included executing lending transactions, investments and currency exchanges. He reported successively to Johan Valcke, Philippe Steverlynck and Paul Van Der Linden. No one reported to him. Currently, Mr. Van Coillie works in the Corporate Sales department and his job responsibilities include the sale of financial products to mainly large and medium sized companies through the Market Room. He reports to Peter Luypaert and no one reports to him.

(aa) Serge Vander Elst: In 1998 and 1999, Mr. Vander Elst's job responsibilities included providing tax advice. He reported to Jan Vanden Abeele, and no one reported to him. Currently, Mr. Vander Elst is an Anti-Money Laundering Officer working in the Prevention and Detection of Money Laundering department. He reports to Chantal Stragier, and no one reports to him.

(bb) Jan Van der Ven: From 1998 until his departure in March 1999, Mr. Van der Ven was managing director of the Secretariat Specialised Activities/ Credit Management at Paribas where his job responsibilities included reviewing credit files and making decisions on credit applications. He reported to Jacques Janssens and various employees reported to him, including Peter Rabaey, Dennis De Coninck and Jean-Paul Jergeay reported to him.

(cc) Nadia Van Hove: In 1998 and 1999, Ms. Van Hove was an analyst in the investment banking department and her job responsibilities included the drafting of research reports for companies envisaging a public listing or a private placement arranged by the Bank. She reported to Stefaan Decraene, and no one reported to her. Currently, Ms. Van Hove is an Investment Manager at Dexia Ventures and her job responsibilities include the management of

investments of the Bank in non-listed companies. She reports to Pascal Wynen and no one reports to her.

(dd) Karel Van Riet: In 1998 and 1999, Mr. Van Riet was an in-house attorney whose job responsibilities included giving legal advice on litigation and recovery issues in credit files. He reported to R. Sneyers while in the Credit Risk Management department at Bacob, and C. De Beys, C. Bal and J. Van Hees reported to him. He reported to Bernard Mommens while in the Juridische Zaken Corporate & Contentieux department at Artesia, and De Beys, Tritz and Van Hees reported to him. Currently, Mr. Van Riet is an in-house attorney in the department Legal Corporate whose job responsibilities include giving legal advice on litigation and recovery issues in credit files. He reports to Willy Van Cauwelaert. Suzanne Tritz, Anne-Marie Misseghers, Marie-Laure De Leener, Katrien Metten, Catherine Decoutere, Véronique Beels, Jean-Blaise Dubois, Ariane Simar, Audrey Réveillon, John Verlaet, Wim David, Piet Cordonnier, Marleen Coolen, Bernard Lamiroy, Benoît Terreur, Fiorella Bongiorno and Dominique Mahiat report to him.

(ee) Patrick Van Tiggel: In 1998 and 1999, Mr. Van Tiggel was a manager whose job responsibilities while at Bacob included managing the corporate credit group and whose job responsibilities while at Artesia included managing the specialized activities subgroup of corporate credit. He reported to Jacques Janssens. When Van Tiggel worked at Bacob, Johan De Vos and Delphine Roloux reported to him. After the merger, Piet Cordonnier, Peter Rabaey, Jean-Paul Jergeay, Marijke Steelant, Stefaan Jans and Veronika Cannoot reported to him. Currently, Mr. Van Tiggel is responsible for the department "Krediet aan Ondernemingen - Direct Approach & Specials" and his job responsibilities include the operational credit flow of the credit files through the various stages of analysis, confirmation and management for the mid-

09/30/2005 17:07 FAX

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030/033

corporate and specialized activities. He reports to François Saverys. Jan Aertgeerts, Jean-Paul Jergeay, Domien Deckers, Nicolas Bourgois, Marc Grodent, Géraldine Morel de Westgaever, Alain Gerday and Antoon Baert report to him.

(ff) Christine Vermeyleen: In 1998, Christine Vermeyleen was an employee in the Market Room Long Term Funding at Bacob where her job responsibilities included the administration of debt offerings. From November 1998 until her departure in July 2000, she was the head of Legal Financial Markets and her job responsibilities included providing advice on financial instruments. She reported to Peter Van Herwegen and it appears that Heidi Wynants and Bernhard Ardaen reported to her.

(gg) Heidi Wynants: In 1998 and 1999, Ms. Wynants was an in-house attorney whose job responsibilities included providing legal support with respect to negotiating the documentation of financial transactions. She reported to Christine Vermeyleen while in the Marktenzaal: Juridische Cel department, and no one reported to her. She reported to Arianne Vanden Berghe while in the Risk Management: Legal Financial Market department, and no one reported to her. Currently, Ms. Wynants is an in-house attorney within the department Securities and Financial Markets whose job responsibilities include providing legal advice on financial instruments, asset management, market regulations and investment companies. She reports to Christel Jennes and no one reports to her.

09/30/2005 17:07 FAX

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031/033

Dated: September 30, 2005

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of Dexia Bank Belgium's Amended Responses and Objections to Lead Plaintiffs' First Set of Interrogatories were served upon the following parties by facsimile and first class mail on September 30, 2005:

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09/30/2005 17:07 FAX

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033/033

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Dated: September 30, 2005



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